Message

From: Bouma, Stacey [Bouma.Stacey@epa.gov]

Sent: 10/1/2020 6:36:00 PM

To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]

CC: Able, Tony [Able.Tony@epa.gov]

Subject: GA Narrative - Can Leif W: Follow-up ORC GA Narrative.

Jeaneanne, can you contact Leif directly concerning the following needed from ORC. Thanks.

- Lead the discussion concerning the term "unreasonably" and explaining the legal meaning of this word.
- Follow up, based on the legal meaning, that this would be considered a change to standards.
- Discuss the litigation risks of the two options which is critical to the discussion.